

the long felt need by the community and companies for the invention.

8. a. Evidence to be obtained or other judicial act to be performed:

- 1) The names of all persons employed by Boehringer Ingelheim KG who were involved in any evaluation, consideration of discussion to license, market or develop the '318 patent or a '318 patent product.
- 2) The names and responsibilities of all persons employed by Boehringer Ingelheim KG who were involved in any evaluation, consideration, or discussion of galanthamine as a treatment for dementia of the Alzheimer's type.
- 3) All negotiations of communications between Boehringer Ingelheim KG and Synpatech or Dr. Bonnie Davis regarding galanthamine as a treatment for dementia of the Alzheimer's type.
- 4) Information related to the November 8, 1989, letter from Prof. E. Muller, Department of Pharmacology, Boehringer Ingelheim KG, attached hereto as Exhibit 2 including without limitation the meaning of, basis for, and any evaluation or analysis concerning the statements set forth in the letter that "based on our extensive preclinical research data available to us, it is our feeling that this compound, while interesting from the point of view of its mechanism of action (acetylcholinesterase inhibitor), does not have the biochemical and pharmacological profile which we consider essential for its potential use in the treatment of Alzheimer's disease."
- 5) Information related to the November 8, 1989, letter from Prof. E. Muller, Department of Pharmacology, Boehringer Ingelheim KG, attached hereto as Exhibit 2 including without limitation the meaning of, basis for, and any evaluation or analysis concerning the statements set forth in the letter that "[t]he limited clinical data (pilot study by Michael Rainer) are not very convincing."
- 6) Information related to the Confidentiality Agreement dated November 10, 1989, attached hereto as Exhibit 3.
- 7) Production of all documents relevant to (3) - (6) and deposition upon oral examination of Prof. E. Muller, Department of Pharmacology, Boehringer Ingelheim KG or a corporate representative of Boehringer Ingelheim KG;
- 8) Authentication of Exhibits 2 and Exhibit 3.